UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

SAJHRESA HILL,	§	
	§	
Plaintiff,	§	
	§	CAUSE NO. 1:17-cv-22
v.	§	
	§	
SCOTT & ASSOCIATES, P.C.,	§	
	§	
Defendant.	§	

DEFENDANT SCOTT & ASSOCIATES, P.C.'S NOTICE OF REMOVAL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Scott & Associates, P.C. and files its Notice of Removal of this action to the United States District Court for the Western District of Texas, Austin Division, and in support therefore respectfully shows unto the Court the following:

1. Sajhresa Hill filed her Original Petition on December 27, 2016 in the 261st District Court, Travis County, Texas, Cause No. D-1-GN-16-006159 ("**Lawsuit**").
2. This is a civil action based upon Plaintiff's contentions that, among other things, Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq*. ("**FDCPA**").
3. Removal is proper because this case involves a federal question—alleged violations of the FDCPA. The entire suit is removable under 28 U.S.C. §1441(a).
4. Removal is timely pursuant to 28 U.S.C. §1446(b) because Defendant has filed this Notice of Removal within 30 days of receipt of Plaintiff's Original Petition, Defendant first ascertained that this lawsuit is one which is or has become removable after receipt of Plaintiff's Original Petition, which was served on January 3, 2017.
5. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers

filed in this action and obtained by Defendant are attached hereto and marked as composite Exhibit "A," and incorporated herein by reference.

6. A copy of this Notice of Removal has been sent to Plaintiff and will be filed with the clerk of the 261st District Court, Travis County, Texas.

7. Venue is proper in this district under 28 U.S.C. §1441(a) because the state court where the suit has been pending is located in this district.

8. A jury demand was not made in state court.

For the above reasons, Defendant requests that this Court assume full jurisdiction over this proceeding as provided by law.

Respectfully submitted,

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COUNSEL FOR SCOTT & ASSOCIATES, P.C.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been forwarded to Plaintiff via **CMRRR to Lead Counsel** and **U.S. 1st Class Mail to all others** on this 12th day of January, 2017

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